

## BrokerCheck Report

**PETER ALDEN ENGELBACH**

CRD# 201177

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

## About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
  - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
  - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

**Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at [brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit [www.finra.org](http://www.finra.org).

**PETER A. ENGELBACH**

CRD# 201177

**Currently employed by and registered with the following Firm(s):**

- B J. ALDEN ASSOCIATES, INC.**  
 43 S Main Street  
 Doylestown, PA 18901  
 CRD# 40002  
 Registered with this firm since: 05/22/1996

**Report Summary for this Broker**

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

**Broker Qualifications****This broker is registered with:**

- 1 Self-Regulatory Organization
- 19 U.S. states and territories

**This broker has passed:**

- 5 Principal/Supervisory Exams
- 7 General Industry/Product Exams
- 2 State Securities Law Exams

**Registration History****This broker was previously registered with the following securities firm(s):**

- B THE DELAWARE BAY COMPANY, INC.**  
 CRD# 18155  
 NEW YORK, NY  
 06/1994 - 07/1996
- B PRUDENTIAL SECURITIES INCORPORATED**  
 CRD# 7471  
 NEW YORK, NY  
 08/1984 - 05/1994
- B DREXEL BURNHAM LAMBERT INCORPORATED**  
 CRD# 7323  
 10/1982 - 08/1984

**Disclosure Events**

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **Yes**

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	3
Civil Event	1
Termination	1



## Broker Qualifications

### Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

**This individual is currently registered with 1 SRO and is licensed in 19 U.S. states and territories through his or her employer.**

### Employment 1 of 1

Firm Name: **J. ALDEN ASSOCIATES, INC.**

Main Office Address: **37 WEST AVE  
SUITE 301  
WAYNE, PA 19087**

Firm CRD#: **40002**

	SRO	Category	Status	Date
B	FINRA	Financial and Operations Principal	Approved	05/22/1996
B	FINRA	General Securities Principal	Approved	05/22/1996
B	FINRA	General Securities Representative	Approved	05/22/1996
B	FINRA	Registered Options Principal	Approved	05/22/1996
B	FINRA	Municipal Securities Representative	Approved	07/10/1997
B	FINRA	Municipal Securities Principal	Approved	09/26/1997
B	FINRA	Operations Professional	Approved	12/19/2011

	U.S. State/ Territory	Category	Status	Date
B	Alabama	Agent	Approved	10/06/2008
B	Arizona	Agent	Approved	04/05/2016
B	Arkansas	Agent	Approved	12/06/2012
B	California	Agent	Approved	07/30/1996
B	Delaware	Agent	Approved	08/27/1996
B	District of Columbia	Agent	Approved	06/17/2013

## Broker Qualifications



### Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Florida	Agent	Approved	08/08/1996
B	Georgia	Agent	Approved	08/14/2008
B	Illinois	Agent	Approved	03/27/2008
B	Indiana	Agent	Approved	04/14/2008
B	Maryland	Agent	Approved	07/29/1997
B	Michigan	Agent	Approved	04/06/2021
B	New Jersey	Agent	Approved	08/01/1996
B	New York	Agent	Approved	08/13/1996
B	North Carolina	Agent	Approved	05/15/2008
B	Ohio	Agent	Approved	02/12/2001
B	Pennsylvania	Agent	Approved	08/07/1996
B	Texas	Agent	Approved	10/12/2006
B	Virginia	Agent	Approved	03/26/2010

### Branch Office Locations

**J. ALDEN ASSOCIATES, INC.**  
 43 S Main Street  
 Doylestown, PA 18901





## Broker Qualifications

### Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

**This individual has passed 5 principal/supervisory exams, 7 general industry/product exams, and 2 state securities law exams.**

### Principal/Supervisory Exams

Exam	Category	Date
<b>B</b> Municipal Securities Principal Examination	Series 53	09/15/1997
<b>B</b> Financial and Operations Principal Examination	Series 27	02/22/1996
<b>B</b> General Securities Principal Examination	Series 24	03/16/1995
<b>B</b> Registered Options Principal Examination	Series 4	07/07/1994
<b>B</b> General Securities Sales Supervisor Examination (Options Module & General Module)	Series 8	10/03/1986

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Operations Professional Examination	Series 99TO	01/02/2023
<b>B</b> General Securities Representative Examination	Series 7TO	01/02/2023
<b>B</b> Municipal Securities Representative Examination	Series 52TO	01/02/2023
<b>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> AMEX Put and Call Exam	PC	11/30/1982
<b>B</b> Interest Rate Options Examination	Series 5	01/21/1982
<b>B</b> Registered Representative Examination	Series 1	12/06/1965

### State Securities Law Exams

Exam	Category	Date
<b>IA</b> Uniform Investment Adviser Law Examination	Series 65	12/09/1992

# Broker Qualifications



## Industry Exams this Broker has Passed, continued State Securities Law Exams Continued

Exam	Category	Date
<div><div>B</div>Uniform Securities Agent State Law Examination</div>	Series 63	11/24/1982

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at [www.finra.org/brokerqualifications/registeredrep/](http://www.finra.org/brokerqualifications/registeredrep/).



## Broker Qualifications



## Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration and Employment History

### Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 06/1994 - 07/1996	THE DELAWARE BAY COMPANY, INC.	18155	NEW YORK, NY
<b>B</b> 08/1984 - 05/1994	PRUDENTIAL SECURITIES INCORPORATED	7471	NEW YORK, NY
<b>B</b> 10/1982 - 08/1984	DREXEL BURNHAM LAMBERT INCORPORATED	7323	
<b>B</b> 07/1974 - 07/1982	THOMSON MCKINNON SECURITIES INC.	829	
<b>B</b> 07/1971 - 08/1975	W. E. HUTTON & CO.	861	
<b>B</b> 03/1971 - 02/1975	ADVEST, INC.	10	
<b>B</b> 08/1970 - 04/1971	HUTCHINS, MIXTER & PARKINSON INCORPORATED	905	

### Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

**Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.**

Employment	Employer Name	Position	Investment Related	Employer Location
12/1995 - Present	J. ALDEN ASSOCIATES, INC.	NOT PROVIDED	Y	JENKINTOWN, PA, United States

### Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

No information reported.

## Disclosure Events



### What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
  - A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
  - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
  -
3. **Disclosure events in BrokerCheck reports come from different sources:**
  - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
  -
4. **There are different statuses and dispositions for disclosure events:**
  - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
    - A "pending" event involves allegations that have not been proven or formally adjudicated.
    - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - A "final" event has been concluded and its resolution is not subject to change.
  - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
    - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
    - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
    - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	3	0
Civil Event	0	1	0
Termination	N/A	1	N/A



## Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

### Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

#### Disclosure 1 of 3

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 09/22/2016

**Docket/Case Number:** [2014038910201](#)

**Employing firm when activity occurred which led to the regulatory action:** J. Alden Associates, Inc.

**Product Type:** No Product

**Allegations:** Without admitting or denying the findings, Engelbach consented to the sanctions and to the entry of findings that he failed to enforce his member firm's WSPs regarding the review and retention of electronic communications. The findings stated that the firm's WSPs required that the firm's registered representatives forward all business related communications to the firm for review and retention. The WSPs required that Engelbach check representatives' email for compliance with this requirement during visits to representatives' offices and further required that he document his review of representatives' email and the outcome of each such review. However, Engelbach failed to conduct any analysis to confirm that representatives were forwarding their business related communications to the firm, and Engelbach did not document his review of representatives' emails, as required



by the firm's procedures.

**Current Status:**

Final

**Resolution:**

Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?**

No

**Resolution Date:**

09/22/2016

**Sanctions Ordered:**

Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	a principal
<b>Duration:</b>	10 business days
<b>Start Date:</b>	10/17/2016
<b>End Date:</b>	10/28/2016

**Monetary Sanction 1 of 1****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$7,500.00**Portion Levied against individual:** \$7,500.00**Payment Plan:****Is Payment Plan Current:** No**Date Paid by individual:** 10/21/2016**Was any portion of penalty waived?** No**Amount Waived:****Reporting Source:** Broker**Regulatory Action Initiated By:** FINRA**Sanction(s) Sought:****Date Initiated:** 09/22/2016**Docket/Case Number:** [2014038910201](#)**Employing firm when activity occurred which led to the regulatory action:** J Alden Associates Inc**Product Type:** No Product**Allegations:** On September 22, 2016 FINRA took disciplinary actions against Peter Engelbach pursuant to an AWC containing its finding that he failed to conduct a proper analysis to confirm that Representatives were forwarding their business related communications to his firm, nor did he properly document his review of representatives' emails, as required by the firm's procedures. As a result, he was fined \$7500 and suspended in any supervisory capacity for ten days.**Current Status:** Final**Resolution:** Acceptance, Waiver & Consent(AWC)



**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 09/22/2016

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Bar (Temporary/Time Limited)

**Capacities Affected:** Principal Capacity

**Duration:** 10 Days

**Start Date:** 10/17/2016

**End Date:** 10/28/2016

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$7,500.00

**Portion Levied against individual:** \$7,500.00

**Payment Plan:**

**Is Payment Plan Current:** No

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

#### Disclosure 2 of 3

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Other: N/A





**Date Initiated:** 01/12/2012

**Docket/Case Number:** [2009016226801](#)

**Employing firm when activity occurred which led to the regulatory action:** J. ALDEN ASSOCIATES, INC.

**Product Type:** No Product

**Allegations:** FINRA RULES 2010, 3130, NASD RULES 2110, 3011(B), 3012, 3013, INTERPRETATIVE MATERIAL 3013, MSRB RULE G-27: A MEMBER FIRM, ACTING THROUGH ENGELBACH, ITS PRESIDENT AND CHIEF EXECUTIVE OFFICER (CEO), FAILED TO ESTABLISH, MAINTAIN AND ENFORCE AN ADEQUATE SYSTEM OF SUPERVISORY CONTROL POLICIES AND PROCEDURES THAT (A) TESTED AND VERIFIED THAT ITS SUPERVISORY PROCEDURES WERE REASONABLY DESIGNED WITH RESPECT TO THE ACTIVITIES OF THE FIRM AND ITS REGISTERED REPRESENTATIVES AND ASSOCIATED PERSONS TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS AND (B) CREATED ADDITIONAL OR AMENDED SUPERVISORY PROCEDURES WHERE THE NEED WAS IDENTIFIED BY SUCH TESTING AND VERIFICATION. THE FIRM, ACTING THROUGH ENGELBACH, FAILED TO PREPARE AN ANNUAL CERTIFICATION FROM ITS CEO (OR EQUIVALENT OFFICER) THAT IT HAD IN PLACE PROCESSES TO ESTABLISH, MAINTAIN, REVIEW, TEST AND MODIFY WRITTEN COMPLIANCE POLICIES AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE FINRA RULES, MSRB RULES AND FEDERAL SECURITIES LAWS AND REGULATIONS, AND THAT THE CEO HAD CONDUCTED ONE OR MORE MEETINGS WITH THE FIRM'S CHIEF COMPLIANCE OFFICER IN THE PRECEDING TWELVE MONTHS TO DISCUSS SUCH PROCESSES. THE FIRM, ACTING THROUGH ENGELBACH, FAILED TO IMPLEMENT ITS CUSTOMER IDENTIFICATION PROGRAM (CIP) IN THAT IT DID NOT VERIFY CUSTOMER IDENTITIES FOR ACCOUNTS OPENED WITH THE FIRM. THE FIRM, ACTING THROUGH ENGELBACH, ALSO FAILED TO ENSURE COMPLIANCE WITH THE BANK SECRECY ACT BY FAILING TO ENFORCE ITS PROCEDURES REQUIRING THE FIRM TO REVIEW ALL SECTION 314(A) REQUESTS THAT IT RECEIVED FROM THE FINANCIAL CRIMES ENFORCEMENT NETWORK (FINCEN).

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)



<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	01/12/2012
<b>Sanctions Ordered:</b>	Censure Civil and Administrative Penalty(ies)/Fine(s)
<b>If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?</b>	No
<b>(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?</b>	



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

#### **Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$10,000.00

**Portion Levied against individual:** \$10,000.00

**Payment Plan:**

**Is Payment Plan Current:****Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:****Regulator Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, ENGELBACH CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE HE IS CENSURED AND FINED, JOINTLY AND SEVERALLY, \$10,000 (\$5,000 OF WHICH PERTAINS TO VIOLATIONS OF MSRB RULES G-27 AND G-41).

**Reporting Source:** Broker

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Censure  
Monetary Penalty other than Fines

**Date Initiated:** 01/12/2012

**Docket/Case Number:** [2009016226801](#)

**Employing firm when activity occurred which led to the regulatory action:** J ALDEN ASSOCIATES, INC.

**Product Type:** No Product

**Allegations:** FINRA RULES 2010, 3130, NASD RULES 2110, 3011(B), 3012, 3013, INTERPRETATIVE MATERIAL 3013, MSRB RULE G-27: A MEMBER FIRM, ACTING THROUGH ENGELBACH, ITS PRESIDENT AND CHIEF EXECUTIVE OFFICER (CEO), FAILED TO ESTABLISH, MAINTAIN AND ENFORCE AN ADEQUATE SYSTEM OF SUPERVISORY CONTROL POLICIES AND PROCEDURES THAT (A) TESTED AND VERIFIED THAT ITS SUPERVISORY PROCEDURES WERE REASONABLY DESIGNED WITH RESPECT TO THE ACTIVITIES OF THE FIRM AND ITS REGISTERED REPRESENTATIVES AND ASSOCIATED PERSONS TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS AND (B) CREATED ADDITIONAL OR AMENDED SUPERVISORY PROCEDURES WHERE THE NEED WAS IDENTIFIED BY SUCH TESTING AND VERIFICATION. THE FIRM, ACTING THROUGH ENGELBACH, FAILED TO PREPARE AN ANNUAL CERTIFICATION FROM ITS CEO (OR EQUIVALENT OFFICER) THAT IT HAD IN PLACE



PROCESSES TO ESTABLISH, MAINTAIN, REVIEW, TEST AND MODIFY WRITTEN COMPLIANCE POLICIES AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE FINRA RULES, MSRB RULES AND FEDERAL SECURITIES LAWS AND REGULATIONS, AND THAT THE CEO HAD CONDUCTED ONE OR MORE MEETINGS WITH THE FIRM'S CHIEF COMPLIANCE OFFICER IN THE PRECEDING TWELVE MONTHS TO DISCUSS SUCH PROCESSES. THE FIRM, ACTING THROUGH ENGELBACH, FAILED TO IMPLEMENT ITS CUSTOMER IDENTIFICATION PROGRAM (CIP) IN THAT IT DID NOT VERIFY CUSTOMER IDENTITIES FOR ACCOUNTS OPENED WITH THE FIRM. THE FIRM, ACTING THROUGH ENGELBACH, ALSO FAILED TO ENSURE COMPLIANCE WITH THE BANK SECRECY ACT BY FAILING TO ENFORCE ITS PROCEDURES REQUIRING THE FIRM TO REVIEW ALL SECTION 314(A) REQUESTS THAT IT RECEIVED FROM THE FINANCIAL CRIMES ENFORCEMENT NETWORK (FINCEN).

<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	01/12/2012
<b>Sanctions Ordered:</b>	Censure Civil and Administrative Penalty(ies)/Fine(s)
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$15,000.00
<b>Portion Levied against individual:</b>	\$10,000.00
<b>Payment Plan:</b>	INSTALLMENT
<b>Is Payment Plan Current:</b>	Yes
<b>Date Paid by individual:</b>	01/23/2012
<b>Was any portion of penalty waived?</b>	No



## Amount Waived:

### Disclosure 3 of 3

<b>Reporting Source:</b>	Broker
<b>Regulatory Action Initiated By:</b>	SECURITIES EXCHANGE COMMISSION
<b>Sanction(s) Sought:</b>	Injunction
<b>Other Sanction(s) Sought:</b>	NONE
<b>Date Initiated:</b>	10/16/1972
<b>Docket/Case Number:</b>	CIVIL #72-3507 SOUTHERN DIST NY
<b>Employing firm when activity occurred which led to the regulatory action:</b>	W.E. HUTTON
<b>Product Type:</b>	Equity - OTC
<b>Other Product Type(s):</b>	
<b>Allegations:</b>	AKIYOSHI YAMADA AN INVT ADV INSTRUCTED ME TO PURCHASE SHS OF GALCO LEASING FOR SEVERAL OF HIS CLIENTS. I WROTE UP THE PUR ORDERS GAVE THEM TO THE OTCT TRADING DESK WHO PURCHASED THE SHARES IN THE OPN MKT. THE STK WAS UNLEGEND & WAS TFRD INTO THE NEW BUYERS NAMES. APPROX 9 MONTHS LATER DURING AN SEC INVESTIGATION OF A YAMADA WE LEARNED THESE SECURITIES WERE SOLD IMPROPERLY BY AN INSIDER.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Stipulation and Consent
<b>Resolution Date:</b>	10/16/1972
<b>Broker Statement</b>	I SIGNED A CONSENT JUDGMENT AGREEING NOT TO TRADE OR SOLICIT TO TRADE THE UNREGISTERED SECURITIES THE UNREGISTERED SECURITIES OF GLACO LEASING COMMON STK. AT THE TIME OF SIGNING THIS COMPANY NO LONGER EXISTED. NO DAMAGES NOR CLAIMS WERE PAID AND NO DISCIPLINARY ACTION WAS TAKEN.



## Civil - Final

This type of disclosure event involves (1) an injunction issued by a court in connection with investment-related activity, (2) a finding by a court of a violation of any investment-related statute or regulation, or (3) an action brought by a state or foreign financial regulatory authority that is dismissed by a court pursuant to a settlement agreement.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Initiated By:</b>	SECURITIES AND EXCHANGE COMMISSION
<b>Relief Sought:</b>	
<b>Other Relief Sought:</b>	
<b>Date Court Action Filed:</b>	10/16/1972
<b>Product Type:</b>	
<b>Other Product Types:</b>	
<b>Employing firm when activity occurred which led to the action:</b>	
<b>Allegations:</b>	
<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	10/16/1972
<b>Sanctions Ordered or Relief Granted:</b>	Cease and Desist/Injunction
<b>Other Sanctions:</b>	
<b>Sanction Details:</b>	
<b>Regulator Statement</b>	08-22-72 ND 72-160 LR-5503: 08-16 COMPLAINT FILED SEEKING TO ENJOIN. ****ON OCTOBER 16, 1972, THE US DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK ACCEPTED AN OFFER OF SETTLEMENT FROM PETER A. ENGELBACH IN WHICH HE CONSENTED TO THE ENTRY OF A PERMANENT INJUNCTION ENJOINING HIM FROM VIOLATIONS OF SECTION 5 OF THE SECURITIES ACT 1933 AND RULE 10b-5 OF THE SECURITIES EXCHANGE ACT OF 1934, WITH RESPECT TO THE OFFERING OF THE COMMON STOCK OF CALCE LEASING SYSTEMS, INC. (SEC V. RAMON



D'ONOFRIO, ANSWISS INTERNATIONAL CORP., GLEEN WOO, BANK VON LINTHGEBIET, MICHAEL TEMKIN, BERNARD FRIEDMAN, STUART SCHIFFMAN, AKIYOSHI, ALAN SEGAL, DANIEL SEGAL A/K/A SEYMOUR DANIEL SEGAL, MARTIN LONDON, MARTIN SUSSMAN, IRA SKALETISKY, PETER A. ENGELBACH, DOMINICK BASSANI, PERRY SCHEER, WILLIAM RODMAN, THOMAS WANDERON, EDWARD VANASCO A/K/A EDWARD VANN, DANIEL EPSTEIN, ABE SIEGEL, HARVEY LABENOW, AND PERICLES CONSTANTINOU, US DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK,  
72 CIVIL 3507 LPG).

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**Reporting Source:** Broker

**Initiated By:** SECURITIES & EXCHANGE COMMISSION

**Relief Sought:**

**Other Relief Sought:**

**Date Court Action Filed:** 10/16/1972

**Product Type:**

**Other Product Types:**

**Court Details:** CIVIL #72-3507 SOUTHERN DIST. NY

**Employing firm when activity occurred which led to the action:**

**Allegations:** IT WAS ALLEGED THAT I WAS INVOLVED IN THE DISTRIBUTION OF THE UNREGISTERED SECURITIES OF GALCO LEASING SYSTEMS, INC. COMMON STOCK. NO DAMAGES WERE CLAIMED NOR PAYMENTS MADE.

**Current Status:** Final

**Resolution:** Consent

**Resolution Date:** 10/16/1972

**Sanctions Ordered or Relief Granted:** Cease and Desist/Injunction

**Other Sanctions:**

**Sanction Details:** I SIGNED A CONSENT JUDGEMENT AGREEING NOT TO TRADE OR SOLICIT TO TRADE THE UNREGISTERED SECURITIES OF





GALCO  
LEASING COMMON STOCK. AT THE TIME OF SIGNING THIS COMPANY NO  
LONGER EXISTED. NO DAMAGES NOR CLAIMS WERE PAID AND NO  
DISCIPLINARY ACTION WAS TAKEN.

**Broker Statement**

AKIYOSHI YAMADA, AN INVESTMENT ADVISOR INSTRUCTED  
ME TO PURCHASE SHARES OF GALCO LEASING FOR SEVERAL OF HIS  
CLIENTS. I WROTE UP THE PURCHASE ORDERS, GAVE THEM TO THE OTC  
TRADING DESK WHO PURCHASED THE SHARES IN THE OPEN MARKETING.  
THE STOCK WAS UNLEGEND AND WAS TRANSFERRED INTO THE NEW  
BUYERS  
NAMES. APPROXIMATELY NINE MONTHS LATER DURING AN SEC  
INVESTIGATION OF A. YAMADA, WE LEARNED THESE SECURITIES WERE  
SOLD IMPROPERLY BY AN INSIDER.



## Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Broker
<b>Employer Name:</b>	PRUDENTIAL SECURITIES INCORPORATED
<b>Termination Type:</b>	Permitted to Resign
<b>Termination Date:</b>	03/04/1994
<b>Allegations:</b>	<p>N/A</p> <p>IT WAS ALLEGED THAT I USED DISCRETION IN THE ACCOUNT OF EVA ABRAHAMER TRUST, A NON DISCRETIONARY ACCOUNT, WITHDREW FUNDS AND FORWARDED THESE FUNDS TO MY WIFE. IT WAS ALSO ALLEGED THAT I FOLLOWED INSTRUCTIONS TO WITHDRAW FUNDS PURSUANT TO A LETTER OF AUTHORIZATION SIGNED BY ABRAHAMER AFTER HER DEATH.</p>
<b>Product Type:</b>	
<b>Other Product Types:</b>	
<b>Broker Statement</b>	<p>TERMINATION</p> <p>(1) THE ACCOUNT IN QUESTION WAS OPENED IN THE TRUST'S NAME PURSUANT TO THE TRUSTEE LOAN OF SECURITIES TO MY WIFE, THE TRUSTEES STEP DAUGHTER. (2) THAT I HAD THE FULL AUTHORITY TO OPEN THE ACCOUNT AND USE THE FUNDS AS DIRECTED BY MY WIFE AND FATHER IN LAW, WHO ASSUMED TO BE A TRUSTEE. (3) THAT THE SUBSEQUENT DEATH OF THE TRUSTEE BEFORE THE LOAN WAS DUE TO BE REPAYED DID NOT EFFECT THE LOAN ARRANGEMENT AND. (4) FINALLY THE TRUSTEE IN HER WILL FORGAVE THE DEBT TO HER ESTATE. I BELIEVED I WAS TAKING ORDERS FROM APPROPRIATE INDIVIDUALS.</p>

## End of Report



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